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14

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

15 MAXIMILIAN KLEIN, et al., on behalf of
 16 themselves and all others similarly situated,

Case No. 3:20-cv-08570-JD

17 Plaintiffs,

**DEFENDANT META PLATFORMS,
 INC.’S NOTICE OF MOTION AND
 MOTION TO EXCLUDE EXPERT
 TESTIMONY AND OPINIONS OF
 SARAH LAMDAN**

18 v.

19 META PLATFORMS, INC., a Delaware
 20 Corporation,

21 Defendant.

Hearing Date: July 24, 2025

22 Time: 10:00 a.m.

23 Judge: Hon. James Donato

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PUBLIC REDACTED VERSION**NOTICE OF MOTION AND MOTION**

1
2 PLEASE TAKE NOTICE that on July 24, 2025 at 10:00 a.m., Defendant Meta Platforms,
3 Inc. will move to exclude the opinions of Sarah Lamdan.

4 Pursuant to Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals*,
5 Inc., 509 U.S. 579 (1993), Meta respectfully requests that the Court exclude the Expert Merits
6 Report of Sarah Lamdan (“Lamdan Rep.”) and the Expert Merits Rebuttal Report of Sarah Lamdan
7 (“Lamdan Rebuttal”), and any testimony drawn from these reports.

MEMORANDUM OF POINTS AND AUTHORITIES

9 As explained in Meta’s concurrently filed Motion for Summary Judgment, the Court need
10 not take up this motion if it again excludes the antitrust injury opinions of Dr. Nicholas
11 Economides and finds summary judgment appropriate on that (or another) basis.

INTRODUCTION

13 Sarah Lamdan seeks to opine about what Meta “knew,” “understood,” or intended based
14 on a cherry-picked set of internal Meta documents and things Lamdan thinks she read or heard
15 about in the news. Far from expert testimony, Lamdan engages in speculation and uninformed
16 assertions of “fact” that are inappropriate in federal court. Her reports contain no reliable
17 methodology that would aid the jury in determining any of the relevant questions at issue in this
18 case, including whether any of Meta’s purportedly misleading statements or omissions supposedly
19 related to privacy or data were in fact “clearly false” and if so, whether they impacted user behavior
20 or competition—which Lamdan herself conceded. Ex. 1, Lamdan Merits Tr. 108:7-22 (“Q. You
21 didn’t personally assess the truth or falsity of any statement Facebook made, correct? ... A. Yeah,
22 I don’t know how I could have without access to ... forensic data material.”); *id.* 78:9-79:1
23 (“[P]eople ... don’t return to using Facebook because they’re so thrilled by these public statements.
24 They return to using Facebook because they feel they have no other choice.”). For these reasons,
25 the Court has already required plaintiffs to proffer her testimony for its consideration. Dkt. 907.
26 Regardless of whether the Court grants that proffer—and it should not, Dkt. 822—Lamdan’s
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1 testimony should be excluded under Rule 702.¹

2 *First*, the only methodology Lamdan used to derive her opinions is reading and
3 summarizing documents other people wrote. She then inappropriately interprets those documents
4 to draw purported “conclusions” about [REDACTED]

5 [REDACTED] Lamdan conducted no survey, no poll, no experiment, and no independent
6 analysis of any kind to support these opinions. No particular expertise is needed to review and
7 summarize documents as Lamdan did; any lawyer or advocate could have presented the same
8 narrative gloss on cherry-picked documents as Lamdan. Allowing Lamdan to present these
9 opinions with the imprimatur of her supposed “expert status” risks confusing the jury and
10 prejudicing Meta.

11 *Second*, even if Lamdan’s opinions were rooted in a reliable methodology, they fail to
12 “speak[] clearly and directly to an issue in dispute in the case.” *Daubert v. Merrell Dow Pharm.*,
13 *Inc.*, 43 F.3d 1311, 1321 n.17 (9th Cir. 1995). Lamdan’s reports opine on topics only tangentially
14 related to the case, like [REDACTED] but that are irrelevant to any actual
15 issues in the case, including Meta’s specific purported misrepresentations or omissions about its
16 privacy policies and practices or whether any of those purported misrepresentations or omissions
17 had any impact on user behavior that affected competition between online platforms.

18 *Third*, Section IV.E of the Lamdan Report and Section IV of the Lamdan Rebuttal proffer
19 expert opinions about [REDACTED]. But Lamdan admits that she has no expertise in
20 sociology or economics. Ex. 1, Lamdan Merits Tr. 79:15-18; Ex. 2, Lamdan CC Tr. 106:13-107:5,
21 236:20-21. Lamdan also cannot rebut Professor Carlton’s opinions concerning market definition
22 or monopoly power, Ex. 3, Lamdan Rebuttal ¶¶3, 6, because she is not qualified to discuss these
23 economic concepts, Ex. 1, Lamdan Merits Tr. 231:13-232:4 (“I feel like discussing competition
24 kind of gets into the world that I’m not ... that’s not my area of expertise.”); *id.* 141:24-142:11
25 (“I’m not one of the economists and I’m not dealing with, you know, the issues of
26 monopolization, ... that’s not something I’m going to be opining on.”).

27 _____
28 ¹ Unless otherwise noted, ‘Ex.’ citations reference exhibits to the Gringer Declaration filed
herewith, emphasis is added, and objections are omitted for deposition citations.

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1 Plaintiffs retained Lamdan to “[REDACTED]
2 [REDACTED]
3 [REDACTED]” Ex. 4, Lamdan Rep. ¶7. But Lamdan did nothing to measure user perceptions and
4 communicated with no Facebook users in forming her opinions. See Ex. 1, Lamdan Merits Tr.
5 266:20-267:2 (“I didn’t, like, conduct interviews or do any kind of—any exploration of that....”);
6 Ex. 2, Lamdan CC Tr. 67:11-16 (Lamdan did not “perform any assessment of how much
7 consumers care about privacy on Facebook compared to how much they care about other aspects
8 of using Facebook”). Lamdan provides a number of opinions based on her own personal review
9 of “[REDACTED],” Ex. 4, Lamdan Rep. ¶9, including—supposedly—all 540,285
10 documents that Meta produced that hit on the term “privacy,” Ex. 2, Lamdan CC Tr. 45:1-12.
11

12 Lamdan never researched Facebook before her involvement in this case. Ex. 2, Lamdan
13 CC Tr. 95:16-21. Because reviewing all of Facebook’s privacy policies would have taken “a lot of
14 time,” Lamdan only reviewed “a few” for her reports. Ex. 1, Lamdan Merits Tr. 26:11-23. Lamdan
15 also is not familiar with the privacy tools that Meta makes available to Facebook users. *Id.* 28:2-4
16 (admitting that Lamdan has not used Facebook’s “privacy checkup tool”); Ex. 2, Lamdan CC Tr.
17 156:13-158:10 (admitting that she knows nothing about Facebook’s “Access Your Information
18 tool,” “Privacy Shortcuts tool,” or “Download Your Data tool”).

19 Lamdan [REDACTED], Ex. 1,
20 Lamdan Merits Tr. 162:16-163:2, and despite opining in her report that Meta “[REDACTED]

21 [REDACTED]” *see, e.g.*, Ex. 4, Lamdan Rep. ¶92, Lamdan ultimately admitted
22 [REDACTED]
23 [REDACTED]. Ex. 1, Lamdan Merits Tr. 175:18-176:6. She also could not offer any substantive
24 testimony about how Meta collected user data or how Facebook’s cookies or ad-targeting work.
25 *Id.* 40:24-42:1 ([REDACTED])

26 ([REDACTED]); 130:9-16 ([REDACTED])

27 ([REDACTED]); *id.* 169:13-170:2 ([REDACTED])

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1 [REDACTED]).

2 After plaintiffs told the Court that they would offer Lamdan as an expert on “data cartels
 3 and privacy,” the Court observed that it is unclear “how consumer expectations about data privacy
 4 relate to the acquisition of the monopoly power,” or what such testimony “ha[s] to do with Section
 5 2 of the Sherman Act.” Hr’g Tr. 8:10-11, 9:3-9 (Apr. 18, 2024). The Court then ordered plaintiffs
 6 to explain the relevance of Lamdan’s testimony by proffer. Dkt. 789 at 1. In evaluating that proffer,
 7 the Court raised additional concerns. For example, plaintiffs said Lamdan would “talk[] about the
 8 fact that consumers care about privacy.” Hr’g Tr. 20:25-21:1 (Nov. 14, 2024). The Court explained
 9 that “[y]ou are going to have a bunch of consumers in the jury box. They understand that. That’s
 10 not expert testimony.” *Id.* 21:2-4. When plaintiffs sought to defend Lamdan’s testimony as
 11 concerning competition, the Court stated “[t]hat’s for your economist to say. That’s not for a
 12 privacy expert to say. Anyone who is talking about competition needs to be an economist.” *Id.*
 13 21:25-22:2. Ultimately, the Court could not “understand why [plaintiffs] need an expert for” those
 14 subjects on which Lamdan would be qualified to testify, and ordered the lodging of her report for
 15 the Court’s review. *Id.* 22:8-9, 24:13-15. Plaintiffs’ proffer remains pending.

16 **ARGUMENT**

17 **I. LAMDAN’S OPINIONS REFLECT NO EXPERT ANALYSIS OR RELIABLE METHODOLOGY
 THAT WILL AID THE JURY CONCERNING ANY ISSUES RELEVANT TO THE CASE**

18 **A. Lamdan’s Summaries Of Documents And Deposition Testimony Are
 Improper**

20 Large swaths of Lamdan’s reports are inaccurate and imprecise summaries of cherry-
 21 picked documents and deposition testimony from the record. Lamdan applies no expertise or
 22 expert methodology to her review of the evidence, as Lamdan herself recognized when she agreed
 23 in her class certification deposition that “anyone reviewing” an internal Meta document discussing
 24 privacy issues “could read … and identify what the document says.” Ex. 2, Lamdan CC Tr. 172:20-
 25 173:1.

26 Courts—including this Court—regularly exclude experts like Lamdan whose opinions do
 27 “not offer any specialized or scientific expertise, or anything beyond the typical knowledge and
 28 experience of a jury.” *DZ Rsrv. v. Meta Platforms, Inc.*, 2022 WL 912890, at *9 (N.D. Cal. Mar.

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1 29, 2022) (Donato, J.). An expert may not simply “restate or summarize record evidence and then
2 state a conclusion without applying a methodology that is reliable and which evinces his/her
3 expertise.” *Siqueriros v. Gen. Motors LLC*, 2022 WL 74182, at *9 (N.D. Cal. Jan. 7, 2022). Juries
4 can ably read and interpret the English language, so an expert must do more than “simply
5 summarize[] evidence already in the record and assert[]” a conclusion. *Edwards Lifescis. Corp. v.*
6 *Meril Life Scis. Pvt. Ltd.*, 2022 WL 254348, at *10 (N.D. Cal. Jan. 27, 2022). Otherwise, the expert
7 acts as “little more than a mouthpiece for presenting the argument of counsel based on
8 uncomplicated evidence already in the case.” *Waymo LLC v. Uber Techs., Inc.*, 2017 WL 5148390,
9 at *6 n.3 (N.D. Cal. Nov. 6, 2017).

10 Much of Lamdan’s reports merely summarizes the evidence in this case, offering
11 “conclusions” about the evidence to provide the jury with plaintiffs’ counsel’s version of reality.
12 For example, Lamdan offers the opinion that [REDACTED]

13 [REDACTED] Ex. 4, Lamdan Rep. §IV.D.2 (header),
14 but every source she cites for this opinion is an internal Meta document or deposition testimony
15 of Meta witnesses, *see id.* ¶¶135-49. There is no independent analysis of these documents or
16 testimony and no application of any expertise to form any opinion about them. In fact, most of the
17 documents Lamdan cites in her reports are not technical or specialized, and certainly do not address
18 technical issues about which Lamdan has any expertise. *See, e.g., id.* ¶95 ([REDACTED]); Ex.
19 2, Lamdan CC Tr. 241:3-4 (“Q. You don’t know what an API is, right? A. Yeah, I don’t know
20 what an API is.”). The documents include [REDACTED]
21 [REDACTED]

22 [REDACTED] *See, e.g., Ex. 1, Lamdan Merits Tr. 92:6-93:1* (confirming
23 that she did not perform any “independent analysis” and noting that she “took the Facebook
24 employee’s written … words at face value”). But this exercise of reading and weighing documents
25 is squarely within the jury’s purview. *See Fed. R. Evid. 702(a)*.

26 The danger of permitting Lamdan to use her selective review of the record is apparent
27 throughout her reports. Lamdan misunderstands (at best) or willfully misconstrues (at worst) the
28 plain language of several documents. For example, she cites an [REDACTED]

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1 [REDACTED]

2 Ex. 4, Lamdan Rep. ¶80 n.131. Setting aside that plaintiffs' case focuses on Facebook, not

3 WhatsApp, and that WhatsApp is not even in plaintiffs' purported market, Lamdan misattributes

4 the quotation to [REDACTED]

5 [REDACTED] *Id.* ¶80. On the basis of the supposed quote [REDACTED] she [REDACTED]

6 [REDACTED] *Id.* The problem is that the quotation actually came from

7 someone else, and Lamdan admitted in deposition that [REDACTED]

8 [REDACTED] Ex. 1, Lamdan Merits Tr. 95:2-96:10, 97:20-98:5. Incredibly,

9 when Lamdan was confronted with the plain language of the email, she [REDACTED]

10 [REDACTED] *Id.* 96:11-19 [REDACTED]

11 [REDACTED] Lamdan's reliance on this

12 document—and others like it—while failing to get even the most basic facts right, or do any

13 independent analysis to support her serious accusation that “[REDACTED]

14 ” Ex. 4, Lamdan Rep. ¶80, risks prejudicing Meta and confusing the jury.

15 As another example, Lamdan says an internal Meta presentation shows [REDACTED]

16 [REDACTED] Ex. 4, Lamdan Rep. ¶¶31-32. Based on [REDACTED]

17 [REDACTED]

18 [REDACTED] *Id.* ¶28. Setting aside whether her opinion is fair given that the

19 document [REDACTED] Lamdan misrepresents the document by

20 including an incomplete screenshot in her report. See Ex. 1, Lamdan Merits Tr. 285:24-286:9 (“[REDACTED]

21 [REDACTED]

22 ”). The screenshot she includes omits [REDACTED]

23 [REDACTED] *Id.* 286:17-287:3. That directly contradicts Lamdan’s

24 conclusion. And in any event, this document contains no specialized or technical information that

25 the jury needs help in understanding. Allowing Lamdan to put an expert imprimatur on her own

26 (incorrect) personal understanding of the document risks both confusion and prejudice. *Waymo*,

27 2017 WL 5148390 at *5 (excluding expert opinion where the expert’s “only contribution would

28 be to pile on a misleading facade of expertise” to the evidence already in the record). All told,

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1 dozens upon dozens of paragraphs of Lamdan's report quote only Meta documents or deposition
2 testimony from this case with no analysis at all, let alone analysis applying a reliable methodology
3 that applies any relevant expertise. Ex. 4, Lamdan Rep. ¶¶16, 18-20, 23-25, 28-31, 33-34, 41-44,
4 55-66, 68-72, 75-78, 80-90, 95-97, 99-102, 104-110, 112-114, 117-119, 122-134, 136-152, 154-
5 157, 159-166, 192, 196; Ex. 3, Lamdan Rebuttal ¶¶8, 10-11, 14, 20-21, 31, 33, 39, 48, 57, 59. As
6 Lamdan herself testified, her reports were [REDACTED]

7 [REDACTED] Ex. 1, Lamdan Merits Tr. 103:25-104:12. That is not admissible expert
8 testimony.

B. Lamdan's Opinions About Meta's Knowledge And Intent Are Improper

10 Lamdan also impermissibly uses her summaries of Meta documents to opine on Meta's
11 purported knowledge and intent. Her opinions include entire sections about how " [REDACTED]

¹² Ex. 4, Lamdan Rep. §IV.B.3, that

¹³ “*id.* §IV.C.2.b, and that

14 “

15 [REDACTED] " *id.* §IV.D.1. Questions about what Meta knew, understood, or
16 intended are for the jury to decide based on the evidence in this case.

Courts have consistently held that opinions regarding a party’s knowledge or state of mind “have no basis in any relevant body of knowledge or expertise,” and therefore are not a proper subject for expert testimony. *Aya Healthcare Servs., Inc. v. AMN Healthcare, Inc.*, 613 F. Supp. 3d 1308, 1321 (S.D. Cal. May 20, 2020), *aff’d*, 9 F.4th 1102 (9th Cir. 2021). “[E]xperts cannot testify about ‘corporate intent,’” *United States v. Pac. Gas & Electric Co.*, 2016 WL 1640462, at *2 (N.D. Cal. April 26, 2016), or the “intention of the parties,” *Miranda v. U.S. Sec. Assocs., Inc.*, 2019 WL 2929966, at *1-2 (N.D. Cal. July 8, 2019) (citations omitted).

24 Here, Lamdan offers opinion after opinion that purport to represent Meta's intent, motive,
25 and state of mind with respect to its privacy practices. For example, she opines that:

- [REDACTED] Ex. 4, Lamdan Rep. §IV.B.3 (header).
 - [REDACTED] *Id.* ¶55.

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- 1 • “[REDACTED]” *Id.* ¶¶73.
2 • “[REDACTED]” *Id.* ¶¶74.
3 • “[REDACTED]” *Id.* ¶¶77.
4 • “[REDACTED]” *Id.* ¶¶80.
5 • “[REDACTED]” *Id.* ¶¶87.
6 • “[REDACTED]” *Id.* ¶¶92.
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17 Each of these statements (and the surrounding discussion) purports to be an expert representation
18 of Meta’s knowledge, intent, or motivation for its actions. This is not reliable expert testimony.

19 Lamdan admitted that she “can’t speak to somebody’s intent.” Ex. 2, Lamdan CC Tr.
20 88:23-89:10; *see also id.* 330:1-18 (“Q. You’re not an expert in intent, right? A. Correct. Q. So
21 you don’t know if Facebook intended to make its privacy policy hard to understand, correct? A. Correct.”). But despite these admissions, Lamdan does exactly that. *See* Ex. 1, Lamdan Merits Tr.
22 84:1-10 (“Q. But you don’t know what Facebook knew or didn’t know, correct? ... A. Facebook’s
23 internal documents indicate or demonstrated that understanding. So you’re right, I wasn’t sitting
24 at the table or on the e-mail chain where these discussions were being had but that conclusion was
25 drawn from reviewing Facebook’s internal documents.”). Permitting Lamdan’s opinions regarding
26 Meta’s state of mind would thus again improperly “substitut[e] the expert’s judgment for the
27 jury’s.” *Oracle Am., Inc. v. Hewlett Packard Enter., Co.*, 2018 WL 6511146, at *3 (N.D. Cal. Dec.
28

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1 11, 2018).

2 **II. LAMDAN'S OPINIONS ARE IRRELEVANT AND SHOULD BE EXCLUDED**

3 Lamdan's reports should also be excluded because they do not "speak[] clearly and directly
4 to an issue in dispute in the case," *Daubert*, 43 F.3d at 1321 n.17, and are instead littered with
5 platitudes like [REDACTED]

6 [REDACTED]

7 [REDACTED] and "[REDACTED]"

8 [REDACTED] " Ex. 4, Lamdan Rep. ¶¶37, 52.

9 The general "importance" and "value" of privacy to consumers is irrelevant to whether the
10 specific alleged statements and omissions had any meaningful impact on competition. Plaintiffs
11 allege that certain statements and omissions related to privacy, which are included in Appendix C
12 of Lamdan's opening report, were false or misleading, and that these alleged statements and
13 omissions caused enough users to use Facebook rather than competing social platforms that they
14 gave Meta an unfair competitive advantage. But Lamdan, by her own admission, is not opining
15 that the statements in Appendix C were false, misleading, or deceptive. Ex. 1, Lamdan Merits Tr.
16 108:7-22 ("Q. You didn't personally assess the truth or falsity of any statement Facebook made,
17 correct? A. Yeah, I don't know how I could have without access to ... forensic data material.").
18 Nor has she opined that these statements caused users to spend more time on Facebook than
19 competing platforms. *Id.* 77:21-78:7 ("I'm trying to think of any instance where Facebook made a
20 statement about privacy and then, you know, the public I'm not sure how that swayed users.").
21 To the contrary—she has testified that the statements had *no* impact on use of the platform at all.
22 Lamdan instead "believe[s] that users just feel resigned to use Facebook," opining, without
23 evidence, that users "don't return to using Facebook because they're so thrilled by these public
24 statements. They return to using Facebook because they feel they have no other choice." *Id.* 78:9-
25 79:1. And inexplicably, her reports do not even discuss *any* of the specific statements in Appendix
26 C of her report. That list was instead drafted by plaintiffs' counsel, and Lamdan did nothing to
27 independently assess it. *Id.* 143:13-17 ("I don't know who specifically drafted it, but it was
28 contributed by counsel."); *id.* 149:19-23 ("Q. Did you do any work to assess whether the

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1 information in the key was accurate? A. No.”).

2 Courts in this district have excluded expert testimony concerning the general importance
 3 of privacy when it is untethered from the core issues the jury must actually decide. In *Opperman*
 4 *v. Kong Techs., Inc.*, for example, the court found that the plaintiffs’ expert’s methodology was
 5 “defect[ive]” because it measured “the value to consumers of privacy generally” rather than the
 6 value of the “two allegedly misrepresented security features.” 2017 WL 3149295, at *12 (N.D.
 7 Cal. July 25, 2017). The defect here is the same: Lamdan opines on privacy and data use generally,
 8 instead of the specific statements and omissions in Appendix C.

9 **III. LAMDAN IS NOT QUALIFIED TO OFFER OPINIONS ON ECONOMIC THEORIES AND
 10 THEIR APPLICATION TO THIS CASE**

11 The Court should exclude Section IV.E of the Lamdan Report and Section IV of the
 12 Lamdan Rebuttal, which address economic theories like [REDACTED]

13 [REDACTED] for the additional reason that—as the Court intuited, Hr’g Tr.
 14 21:25-22:2 (Nov. 14, 2024)—Lamdan is unqualified to offer these opinions. These concepts are
 15 rooted in principles of economic decision making, about which Lamdan is not, and does not claim
 16 to be, an expert. They should therefore be excluded as “outside [her] expertise.” *Apple, Inc. v.*
 17 *Samsung Elecs. Co.*, 2013 WL 5955666, at *2 (N.D. Cal. Nov. 6, 2013).²

18 First, Lamdan opines that users feel “[REDACTED]
 19 ” referencing the “[REDACTED]” and stating that “[REDACTED]
 20 ” [REDACTED]
 21 ” Ex. 4, Lamdan
 22 Rep. ¶¶190-91. But Lamdan admits she is unaware of the ways users can control and consent to
 23 the collection and use of their data. *See* Ex. 2, Lamdan CC Tr. 155:22-158:10; Ex. 1, Lamdan
 24 Merits Tr. 28:2-4; *id.* 228:4-9. Lamdan also has not conducted any “assessment of how much
 25 consumers care about privacy on Facebook compared to how much they care about other aspects
 26 of using Facebook.” Ex. 2, Lamdan CC Tr. 67:11-16.

27 _____
 28 ² Despite opining that users must be on Facebook or face severe consequences, Lamdan *herself* is
 not on Facebook. Ex. 2, Lamdan CC Tr. 166:2-5.

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1 Relatedly, Lamdan opines without the requisite expertise that “
2 [REDACTED]” Ex. 3,
3 Lamdan Rebuttal ¶56. Her opinion on this point rests entirely on the premise that “there is only
4 one choice available” because “Facebook has network effects … they are pervasive, right, so
5 people feel driven to use Facebook, stay on Facebook, rejoin Facebook if they leave Facebook
6 because of those network effects.” Ex. 1, Lamdan Merits Tr. 221:24-222:18. But Lamdan is not
7 an economist. *Id.* 79:15-18 (“Yeah, I continue to not be an economist”). She is “not a market or
8 antitrust expert” and admittedly cannot speak on “Facebook being a monopoly or not being a
9 monopoly.” *Id.* 276:16-23, 276:2-15. She also lacks a basis to offer any kind of opinion regarding
10 network effects or whether other choices exist for Facebook users in the market. *Id.* 276:16-23
11 (“Q. So you’re not offering an opinion that there is a social network market? A. No, I’m not – I’m
12 not here to opine on that at all.”); *id.* 231:13-232:4 (stating that the “monopoly discussion” is “not
13 [her] area of expertise”); *id.* (“I feel like discussing competition kind of gets into the world that
14 I’m not … that’s not my area of expertise.”).

Because Lamdan is not qualified to opine on these technical, economic, and sociological topics, the entirety of Section IV.E of her report and Section IV of her rebuttal should be excluded.

CONCLUSION

18 Lamdan has not offered an expert opinion, much less a reliable or relevant one. The Court
19 should therefore exclude the entirety of the Lamdan Report and the Lamdan Rebuttal.

21 | Dated: April 28, 2025

Respectfully submitted,

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By: /s/ Sonal N. Mehta
Sonal N. Mehta

WILMER CUTLER PICKERING HALE
AND DORR LLP

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Attorney for Defendant Meta Platforms, Inc.

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PUBLIC REDACTED VERSION

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April, 2025, I electronically transmitted the public redacted version of the foregoing document to the Clerk's Office using the CM/ECF System and caused the version of the foregoing document filed under seal to be transmitted to counsel of record by email.

By: /s/ Sonal N. Mehta
Sonal N. Mehta